

**Washington State Department of Ecology – Children’s Safe Products Reporting rulemaking update and flame retardant evaluation (per RCW 70.240.035).**

**Status of potential changes to CHCC list from law amendment and comment letters - 10/31/16 update**

Ecology continues to evaluate stakeholder [requests](#) to add or delist chemicals of high concern to children (CHCCs) during this CSPA Reporting rulemaking. Our initial evaluation was based on whether the stakeholder request included evidence (full scientific references and web links where possible) that a chemical does or does not meet the same basic criteria used to create the CHCC list in the 2011 CSPA Reporting rule. We will further evaluate chemicals if that evidence is forthcoming. Our CHCC [evaluation process](#) is explained in a document posted on the CSPA Rule public involvement [website](#).

The following two tables list the chemicals identified for consideration during this preliminary rulemaking for addition or delisting based on stakeholder requests or the amended law (flame retardants from [RCW 70.240.035](#) are noted with an \*).

**Table 1** identifies the chemicals that continue to be evaluated by Ecology and Department of Health for CHCC addition or delisting. Evidence used to identify toxicity and exposure potential (see [evaluation](#)) for each chemical are identified in the last two columns. The references listed in the Toxicity and Exposure Potential columns are briefly explained at the end of the table. New chemicals (since 10/03/16) are noted in bold font.

**Table 2** lists chemicals from stakeholder comments that are not currently under consideration. The table includes a summary of the toxicity and exposure information reviewed. Chemicals that moved from Table 1 to Table 2 are noted with a #.

**Table 1**

CAS Number	Acronym	Chemical Name	Toxicity	Exposure Potential
<b>ADDITION</b>				
<b>78-33-1</b>	<b>TBPP</b>	Tris(p-tert-butylphenyl) phosphate	EPA, DOH	Children's product
<b>80-90-1</b>	<b>BPS</b>	Bisphenol S	EPA	Biomonitoring, dust
84-61-7	DCHP	Dicyclohexyl phthalate	EU ED, CHAP	Dust
84-69-5	DIBP	Diisobutyl phthalate	SVHC, CHAP	Biomonitoring, children's product, dust
115-86-6	TPP* or TPHP	Triphenyl phosphate	EPA , DOH	Biomonitoring, children's product, dust
<b>126-72-7</b>	<b>TDBPP</b>	Tris (2,3-dibromopropyl) phosphate	NTP, Prop 65, and IARC	Dust
<b>126-73-8</b>	<b>TNBP or TBP</b>	Tri-n-butyl phosphate or Tributyl phosphate	ECHA	Biomonitoring, dust
335-67-1	PFOA	Perfluorooctanoic acid and related substances	SVHC, IARC	Biomonitoring, dust
<b>620-92-8</b>	<b>BPF</b>	Bisphenol F	EPA	Dust
<b>1241-94-7</b>	<b>EHDPP or DPEHP</b>	Ethylhexyl diphenyl phosphate or Diphenyl (2ethylhexyl) phosphate	DOH	Biomonitoring

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Table 1

CAS Number	Acronym	Chemical Name	Toxicity	Exposure Potential
1330-78-5	TCP	Tricresyl phosphate	EPA, DOH	Dust
13674-84-5	TCPP* or TCIPP	Tris (2chloroisopropyl) phosphate	EPA, DOH	Biomonitoring, children's product, dust
26040-51-7	TBPH* or BEH-TEBP	Bis (2-ethylhexyl) 2,3,4,5-tetra bromophthalate	EPA, DOH	Biomonitoring, children's product, dust
38051-10-4	V6*	V6 (based on TCEP as an impurity)	EPA, DOH	Children's product, dust
68937-41-7	IPTPP*	Isopropylated triphenyl phosphate	EPA, DOH	Biomonitoring, children's product
84852-53-9	DBDPE	Decabromodiphenylethane	EPA, DOH	Biomonitoring, children's product, dust
85535-84-8	SCPP	Short-chain chlorinated paraffins	NTP, Prop 65, EU ED	Biomonitoring, WA PBT
183658-27-7	TBB* or EH-TBB	2-ethylhexyl-2,3,4,5-tetrabromobenzoate	EPA, DOH	Biomonitoring, children's product, dust
<b>DELIST</b>				
85-44-9	--	Phthalic anhydride	--	Children’s product
7439-98-7	Mo	Molybdenum	--	Biomonitoring, children's product

CAS – chemical abstract service; **Bold** – chemical added since 10/03/16;

\* - flame retardants identified in RCW 70.240.035

<p><b>Toxicity References:</b></p> <ul style="list-style-type: none"> <li>• CHAP – Chronic hazard advisory panel on <a href="#">phthalates and phthalate alternatives</a></li> <li>• DOH – Washington Department of Health review of scientific data</li> <li>• ECHA – <a href="#">European Chemicals Agency</a> brief profile</li> <li>• EPA – EPA <a href="#">flame retardant</a> or <a href="#">BPA</a> alternative assessments</li> <li>• EU ED – EU Category 1 <a href="#">endocrine disruptors</a></li> <li>• IARC – <a href="#">International Agency for Research on Cancer</a></li> <li>• IRIS – <a href="#">Integrated Risk Information System</a></li> <li>• NTP – <a href="#">National Toxicology Program</a></li> <li>• Prop 65 – <a href="#">California Proposition 65 list</a></li> <li>• SVHC – EU <a href="#">substances of very high concern</a></li> </ul>	<p><b>Exposure Potential References:</b></p> <ul style="list-style-type: none"> <li>• Children’s product – Danish, Dutch, or peer reviewed scientific study of chemical reported in children’s products</li> <li>• Biomonitoring - <a href="#">NHANES</a> or peer reviewed scientific study of chemical reported in humans</li> <li>• Dust – peer reviewed scientific study of chemical reported in house or daycare dust or indoor air</li> <li>• WA PBT – chemical on the Washington list of <a href="#">persistent, bioaccumulative or toxic</a></li> <li>• References for individual studies will be provided</li> </ul> <p>NHANES – National Health and Nutrition Examination Survey, Center for Disease Control</p>
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**Table 2**

<b>CAS</b>	<b>Chemical</b>	<b>Toxicity</b>	<b>Exposure Potential</b>
<b>Chemicals requested to be added – No NEW data provided</b>			
79-01-6	Trichloroethylene		
79-06-1	Acrylamide	IARC, IRIS, NTP, Prop65, SVHC	
91-59-8	2-Naphthylamine	IARC, NTP, Prop65, SVHC	
92-87-5	Benzidine and salts	IARC, IRIS, Prop65, SVHC	
96-18-4	1,2,3-Trichloropropane	IARC, NTP, Prop65, SVHC,	
97-56-3	CI Solvent Yellow 3	IARC, NTP, Prop65, SVHC,	
101-14-4	4,4’ Methylene (2-chloroaniline)	IARC, NTP, Prop65, SVHC	
101-77-9	4,4’ Diaminodiphenylmethane	IARC, NTP, Prop65, SVHC,	
106-89-8	Epichlorohydrin	EU ED, IARC, IRIS, NTP, Prop65,SVHC	
106-93-4	1,2 Dibromomethane	EU ED, IARC, NTP, Prop65, SVHC	
106-99-0	1,3-Butadiene	IARC, IRIS, NTP, Prop65, SVHC	
107-06-2	1,2 Dichloroethane	IARC, IRIS, NTP, Prop65, SVHC	
120-71-8	6-Methoxy-m-toluidine	IARC, NTP, SVHC, Prop65	
605-50-5	Diisopentyl phthalate (DIPP)		
838-88-0	4,4’methylenedi-o-toluidine	IARC, NTP, SVHC, Prop65	
7440-02-0	Nickel and nickel compounds	IARC, NTP, Prop65	
7440-41-7	Beryllium	IARC, IRIS, NTP, SVHC	
26471-62-5	Toluene diisocyanate	IARC, NTP, Prop65	
<b>Chemicals requested to be added – NEW data not compelling</b>			
<b>78-51-3</b>	<b>Tris (2-butoxyethyl) phosphate (TBOEP)</b>		Dust
117-82-8 #	Bis(2-methoxyethyl) phthalate (DEMP)	SVHC	Not compelling
131-18-0 #	Dipentyl phthalate (DNPP)	EU ED, SVHC, CHAP	Not enough
13560-89-9 #	Dechlorane plus		Dust
27554-26-3 #	Diisooctyl phthalate (DIOP)	CHAP	Not compelling
<b>37853-59-1</b>	<b>1,2-bis(2,4,6-tribromophenoxy) ethane (BTBPE)</b>		Dust

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**Table 2**

CAS	Chemical	Toxicity	Exposure Potential
<b>Chemicals requested to be delisted – insufficient NEW data</b>			
50-00-0	Formaldehyde	IRIS, IARC, Prop65, NTP	Children’s products
94-13-3 #	Propyl paraben	EU ED	Biomonitoring, children’s products
94-26-8 #	Butyl paraben		
99-76-3 #	Methyl paraben		
120-47-8 #	Ethyl paraben		
99-96-7 #	Para-hydroxy benzoic acid		Children’s products
556-67-2	Octamethylcyclotetrasiloxane (D4)	EU ED	Children’s products
5466-77-3 #	2-ethylhexyl 4-methoxycinnamate	EU ED	Children’s products

# - chemical moved from Table 1 to Table 2

**Bold** – chemical added since 10/03/16

If you have additional questions, please contact:

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Visit the following website for additional information about this rulemaking:

- [http://www.ecy.wa.gov/programs/hwtr/laws\\_rules/CSP\\_ReportingRule/1608ov.html](http://www.ecy.wa.gov/programs/hwtr/laws_rules/CSP_ReportingRule/1608ov.html)

Sign up on the Children’s Safe Products Act listserv to receive updates:

- <http://listserv.wa.gov/cgi-bin/wa?A0=CHILDRENS-SAFE-PRODUCTS>
- Link to the current law: CSPA – [RCW 70.240](#)
- Link to the current rule: CSPA Reporting Rule – [WAC 173-334](#)

**List of acronyms commonly used in CSPA discussions (not including chemical names):**

CHCC – chemicals of high concern to children	IARC – International Agency for Research on Cancer
CHAP – chronic hazard advisory panel	IRIS – Integrated Risk Information System
CPSC – US Consumer Products Safety Commission	NHANES – National Health and Nutrition Examination Survey, Center for Disease Control
CSPA – Children’s Safe Products Act	NTP – National Toxicology Program
DOH – Department of Health	PBT – persistent, bioaccumulative, toxic
ECHA – European Chemicals Agency	Prop 65 – California Proposition 65
ECY – Department of Ecology	RCW – Revised Code of Washington (law)
ED – endocrine disruptor	SVHC – substances of very high concern
EPA – US Environmental Protection Agency	vPvB – very persistent, very bioaccumulative
HB2545 – house bill 2545	WAC – Washington Administrative Code (rule)